

**PETROLEUM COUNTY, MONTANA**

**Instructions for using the attached Crosswalk Reference Document  
for Review and Submission of Local Mitigation Plans  
to the State Hazard Mitigation Officer and FEMA Regional Office**

Attached is a crosswalk reference document, which is based on the Final Draft Report ***State and Local Plan Interim Criteria Under the Disaster Mitigation Act of 2000***, published by FEMA HQ and dated July 11, 2002. This document was based on the *Disaster Mitigation Act of 2000* (P.L. 106-390), enacted October 30, 2000 and *44 CFR Parts 201 and 206 Interim Final Rule*, published February 26, 2002.

The purpose of the crosswalk is to provide a tool to local jurisdictions in developing and submitting Mitigation Plans under Section 322 of the Disaster Mitigation Act of 2000. The crosswalk can be used to assist local or multi-jurisdiction entities in the process of developing and reviewing Local or Multi-jurisdictional plan(s). Each Local or Multi-jurisdictional plan should be reviewed by the pertinent local jurisdictional entity prior to submitting the plan to the respective State. In addition as stated in the Interim Final Rule §201.6(d)(1) "Plans must be submitted to the State Hazard Mitigation Officer for initial review and coordination. The State will then send the plan to the appropriate FEMA Regional Office for formal review and approval." The local jurisdiction must fill out column 3 prior to submitting the plan for formal review and approval.

Tribes may submit hazard mitigation plans through their respective states or they can directly submit their plans to FEMA Region VIII. This means they can write a Local or Multi-jurisdictional Plan as a sub-grantee or they may write a Standard or Enhanced State Plan as a Grantee. When tribes are considering how they want to develop and submit their plans, they need to consider whether or not they want to be Grantees directly from FEMA or Sub-grantees through their respective states. The deciding factor would be how they want to apply for and receive Pre-disaster Mitigation Grant projects, Hazard Mitigation Grant Program projects, or Flood Mitigation Assistance projects. Interested tribes can determine this by talking with their State Hazard Mitigation Officer or their respective FEMA Regional Federal Insurance and Mitigation Administration (FIMA) Division. In any case, each tribe should review their own plans before submitting them to their state or FEMA Regional office.

Following are explanations of each column.

- Column 1 indicates on what page or pages in the *State and Local Plan Interim Criteria* document more detailed information can be found regarding the requirements.
- Column 2 references and directly quotes the *44 CFR Parts 201 and 206 Interim Final Rule*.
- Column 3 is for the tribe and/or local jurisdiction to indicate the Section or Annex and the page number(s) in their plan where the requirement is addressed.
- Column 4 provides space for State/FEMA comments and for scoring of the plan.

## Local Mitigation Plan Review and Approval Status

Local Requirement		
Local Plan Submitted to the State by: Lisa Solf	Title: LEPC Chairperson	Date: September 22, 2003

State Requirement		
State Reviewer: Larry Akers	Title: SHMO	Date: September 23, 2003

FEMA Requirement		
FEMA Reviewer: Doug Bausch Wade Nofziger Marty Kientz	Title: Program Specialist Hazard Mitigation Specialist Hazard Mitigation Specialist	Date: October 20, 2003
Date Received in FEMA Region VIII	September 26, 2003	
Plan Not Approved		
Plan Approved	XXX	
Date Approved	November 5, 2003	

Point of Contact: Lisa Solf	Local Plan Reviewed by:	
Title: Secretary LEPC	Title:	
Agency: Petroleum County, MT	NFIP Status (Single Jurisdiction)	
Phone Number: (406) 429-5551	Participating <input type="checkbox"/>	Non-Participating <input type="checkbox"/>

[illegible]

LOCAL HAZARD MITIGATION PLAN REVIEW – PETROLEUM COUNTY, MT  
REGION VIII, OCTOBER 20, 2003 – PAGE 3

**LOCAL MITIGATION PLAN SUMMARY WORKSHEET**

The plan cannot be reviewed if the prerequisite is not met for a single jurisdictional plan, or prerequisites are not met for a multi-jurisdictional plan.

All mandatory criteria, except those highlighted in gray, must receive a score of “**Satisfactory**” or “**Outstanding**” for the plan to receive FEMA approval. A less than “Satisfactory” score on subsections highlighted in gray will not preclude the plan from passing. Reviewer’s comments must be provided for requirements receiving a “**Needs Improvement**” score.

**SCORING SYSTEM**

Please check one of the following for each requirement.

**U – Unsatisfactory:** The plan does not address the criteria.

**N – Needs Improvement:** The plan addresses the criteria, but needs significant improvement. Reviewer’s comments must be provided.

**S – Satisfactory:** The plan meets the minimum criteria. Reviewer’s comments are encouraged, but not required.

**O – Outstanding:** The plan exceeds the minimum criteria. Reviewer’s comments are encouraged, but not required.

**Prerequisite (s) (Check Applicable Box)**

Adoption by the Local Governing Body:

§201.6(c)(5) **OR**

Multi-jurisdictional Plan Adoption: §201.6(c)(5)  
**AND**

Multi-jurisdictional Participation: §201.6(a)(3)

NOT MET	MET
	S
	S
	S

**Planning Process**

Documentation of the Planning Process:

§201.6(c)(1)

U	N	S	O
		S	

**Risk Assessment**

Identifying Hazards: §201.6(c)(2)(i)

Profiling Hazard Events: §201.6(c)(2)(i)

Assessing Vulnerability: Overview: §201.6(c)(2)(ii)

Assessing Vulnerability: Identifying Assets:  
§201.6(c)(2)(ii)(A)

Assessing Vulnerability: Estimating Potential  
Losses: §201.6(c)(2)(ii)(B)

Assessing Vulnerability: Analyzing Development  
Trends: §201.6(c)(2)(ii)(C)

Multi-jurisdictional Risk Assessment:  
§201.6(c)(2)(iii)

U	N	S	O
		S	
		S	
		S	
	N		
	N		
		S	
		S	

**Mitigation Strategy**

Local Hazard Mitigation Goals: §201.6(c)(3)(i)

Identification and Analysis of Mitigation Measures:  
§201.6(c)(3)(ii)

Implementation of Mitigation Measures:  
§201.6(c)(3)(iii)

Multi-jurisdictional Mitigation Strategy:  
§201.6(c)(3)(iv)

U	N	S	O
		S	
		S	
		S	
		S	

**Plan Maintenance Procedures**

Monitoring, Evaluating, and Updating the Plan:  
§201.6(c)(4)(i)

Implementation Through Existing Programs:  
§201.6(c)(4)(ii)

Continued Public Involvement: §201.6(c)(4)(iii)

U	N	S	O
		S	
		S	
		S	

**Additional State Requirements\***

Insert State Requirement

Insert State Requirement

Insert State Requirement

U	N	S	O

**LOCAL MITIGATION PLAN APPROVAL STATUS**

PLAN NOT APPROVED

PLAN APPROVED

PLAN REVIEW CRITERIA REFERENCE  (SECTION PAGE #)	REQUIREMENT AS TAKEN FROM THE INTERIM FINAL RULE PART 201	LOCATION IN THE PLAN  (INDICATE SECTION OR ANNEX AND PAGE #)	SCORE / STATE / FEMA REVIEWER COMMENTS  <u>SCORING SYSTEM</u>  MET/NOT MET (FOR PREREQUISITE (S) ONLY)  U--UNSATISFACTORY N--NEEDS IMPROVEMENT  S--SATISFACTORY O--OUTSTANDING	
PREREQUISITE (S)  (3-1)			<i>NOTE: The prerequisite, or prerequisites in the case of multi-jurisdictional plans, must be met before the plan can be approved.</i>  <i>The introduction on pages 1-11 provides an interesting perspective of this county.</i>	
Adoption by the Local Governing Body  (3-2)	Requirement §201.6(c)(5):  [The local hazard mitigation plan shall include] documentation that the plan has been formally adopted by the governing body of the jurisdiction requesting approval of the plan (e.g., City Council, County Commissioner, Tribal Council)...	Resolution front	S	Resolution for County dated August 4, 2003 is included.
OR				
Multi-Jurisdictional Plan Adoption  (3-3)   AND	Requirement §201.6(c)(5):  For multi-jurisdictional plans, each jurisdiction requesting approval of the plan must document that it has been formally adopted.	Resolution front	S	Resolution for Winnett is included dated August 20, 2003.
Multi-Jurisdictional Planning Participation  (3-4)	Requirement §201.6(a)(3):  Multi-jurisdictional plans... accepted, as appropriate, as long as each jurisdiction has... accepted...plans.	Section 2	S	Documentation of participation of the County and Town of Winnett is included in Section 2 and consists of County Board meetings, plan review meetings and other public meetings. Good detail. Good job!

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<b>PLANNING PROCESS</b>  (3-5)			
<b>Documentation of the Planning Process</b>  (3-6)	<b>Requirement §201.6(c)(1):</b>  [The plan must document] the planning process used to develop the plan, including how it was prepared, who was involved in the process, and how the public was involved.	Pg 13	<b>S</b> Section 2 documents who was involved and the process. They indicate that every household in the County was contacted. Town meetings and other local community participation ensured a widespread input into the planning process.
<b>RISK ASSESSMENT</b>  (3-9)			
<b>Identifying Hazards</b>  (3-10)	<b>Requirement §201.6(c)(2)(i):</b>  [The risk assessment shall include a] description of the type....of all natural hazards that can affect the jurisdiction...	Pgs 17-18	<b>S</b> A summary of the hazards are provided on pages 17 and 18, and a section is devoted to each hazard. Also, a historical review was conducted to determine natural hazard incidence.
<b>Profiling Hazard Events</b>  (3-14)	<b>Requirement §201.6(c)(2)(i):</b>  Description of the...location and extent of all natural hazards that can affect the jurisdiction. The plan shall include information on previous occurrences of hazard events and on the probability of future hazard events.	Part B	<b>S</b> Each hazard specific section includes information on past events. They have done a great job in searching available newspaper articles. The new site: <a href="http://go2cla.sc.edu/hazard/db_registration">http://go2cla.sc.edu/hazard/db_registration</a> includes information on 53 historic events dating back to 1961 in Petroleum County, including property and crop losses.

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<b>Assessing Vulnerability: Overview (Currently found under Identifying Assets section, p.3-18—to be corrected in next version of the <i>Plan Criteria</i>)</b>	<b>Requirement 201.6(c)(2)(ii):</b> [The risk assessment shall include a] description of the jurisdiction's vulnerability to the hazards described in paragraph (c)(2)(i) of this section. This description shall include an overall summary of each hazard and its impact on the community.	Part B	<b>S</b> A vulnerability assessment section is provided within each hazard specific section. The vulnerability sections include a general summary of potential impacts on the community.
<b>Assessing Vulnerability: Identifying Assets  (3-18)</b>	<b>Requirement 201.6(c)(2)(ii)(A):</b> The plan should describe vulnerability in terms of: The types and numbers of existing and future buildings, infrastructure, and critical facilities located in the identified hazard areas...	Pgs 19-24	<b>N</b> They have done a good job in putting together an inventory that includes valuations. However, it needs to have the data associated with hazard areas. ARC View technology is being introduced to improve the quality of available hazard vulnerability maps. We recommend this can be accomplished during the next plan revision (5 yr update).  <b><i>Note: A less than "Satisfactory" score on this requirement will not preclude the plan from passing</i></b>

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<b>Assessing Vulnerability: Estimating Potential Losses</b>  (3-22)	<b>Requirement 201.6(c)(2)(ii)(B):</b> [The plan should describe vulnerability in terms of an] estimate of the potential dollar losses to vulnerable structures identified in paragraph (c)(2)(i)(A) of this section and a description of the methodology used to prepare the estimate...	Pg 24	<b>N</b> Some costs, such as firefighting costs are provided. We suggest correlating equipment and facilities to type of hazard. Improvement of data collection is planned. This can be accomplished during the next plan revision (5 yr update).  <i><b>Note: A less than "Satisfactory" score on this requirement will not preclude the plan from passing.</b></i>
<b>Assessing Vulnerability: Analyzing Development Trends</b>  (3-24)	<b>Requirement 201.6(c)(2)(ii)(C):</b> [The plan should describe vulnerability in terms of] providing a general description of land uses and development trends within the community so that mitigation options can be considered in future land use decisions.	Pg 24, 29-30	<b>S</b> There is a good summary of development trends on pages 29 and 30. They indicate strengthening of their infrastructure as being important for the communities' future. In addition, the flood hazard section identifies an issue along the Musselshell River where new homes and hunting cabins are being built in the potential flood fringe areas. This description of vulnerability provides enough information to consider potential mitigation measures, such as flood plain management including mapping and participation in the NFIP.  <i><b>Note: A less than "Satisfactory" score on this requirement will not preclude the plan from passing.</b></i>



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<b>Multi-Jurisdictional Risk Assessment</b>  <b>(3-26)</b>	<b>Requirement §201.6(c)(2)(iii):</b>  For multi-jurisdictional plans, the risk assessment section must assess each jurisdiction's risks where they vary from the risks facing the entire planning area.	Pgs 16-18	<b>S</b>	In the hazard identification sections the area impacted is typically described as "County-wide" or impacting both the Town of Winnett and Petroleum County. This includes wildfire, severe weather, drought, dam failure, and hazmat.
<b>MITIGATION STRATEGY</b>  <b>(3-29)</b>	<b><i>Note: Any changes made in the risk assessment to address previous unsatisfactory or needs improvement scores, will need to be reflected in the Mitigation Strategy section to gain final approval of the plan.</i></b>			
<b>Local Hazard Mitigation Goals</b>  <b>(3-30)</b>	<b>Requirement §201.6(c)(3)(i):</b>  [The hazard mitigation strategy shall include: a] description of mitigation goals to reduce or avoid long-term vulnerabilities to the identified hazards.	Part B	<b>S</b>	Broad general goals are provided and they are linked very well to the mitigation strategy within each Five Year Mitigation Action Plan Matrix. This includes long and short-term improvements.
<b>Identification and Analysis of Mitigation Measures</b>  <b>(3-34)</b>	<b>Requirement §201.6(c)(3)(ii):</b>  [The mitigation strategy shall include a] section that identifies and analyzes a comprehensive range of specific mitigation actions and projects being considered to reduce the effects of each hazard, with particular emphasis on new and existing buildings and infrastructure.	Part B	<b>S</b>	A broad range of mitigation <u>strategies</u> are provided in the action plan matrix following each hazard specific section. However, few "traditional" mitigation <u>projects/activities</u> are identified. We suggest this component of the planning effort be reviewed and defined during the next plan revision (5 yr update). The "How to Guides" can help the county identify mitigation projects/activities.

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Implementation of Mitigation Measures  (3-36)	Requirement §201.6(c)(3)(iii): [The mitigation strategy section shall include] an action plan describing how the actions identified in section (c)(3)(ii) will be prioritized, implemented, and administered by the local jurisdiction. Prioritization shall include a special emphasis on the extent to which benefits are maximized according to a cost benefit review of the proposed projects and their associated costs.	Part B	S	Each action plan matrix indicates that priorities were established by public comment, the planning process and the LEPC. The matrix helps identify the benefits, but in the future, it could be explicitly stated that cost was also considered in prioritizing the mitigation actions. The last page of each hazard section includes a mitigation strategy that describes in more detail the action items and the implementing agencies, as well as possible sources of funding.
Multi-jurisdictional Mitigation Strategy  (3-40)	Requirement §201.6(c)(3)(iv): For multi-jurisdictional plans, there must be identifiable action items specific to the jurisdiction requesting FEMA approval or credit of the plan.	Part B	S	The “Coordinating Agencies” section (within each hazard section) and the mitigation strategy include involvement of all jurisdictions.
PLAN MAINTENANCE PROCEDURES  (3-43)				
Monitoring, Evaluating, and Updating the Plan  (3-44)	Requirement §201.6(c)(4)(i): Describing... updating the mitigation plan within a five-year cycle.	Pg 14	S	On page 14, they indicate an annual review and update every five years. Good detail.

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<b>Implementation Through Existing Programs</b>  <b>(3-48)</b>	<b>Requirement §201.6(c)(4)(ii):</b> [The plan shall include a] process by which local governments incorporate the requirements of the mitigation plan into other planning mechanisms such as comprehensive or capital improvement plans, when appropriate...	Pgs 14 & 29	<b>S</b> They indicate on page 14 that the LEPC will assume the primary role of plan maintenance and on page 29 they indicate incorporation into the Capital Improvement Plan.
<b>Continued Public Involvement</b>  <b>(3-50)</b>	<b>Requirement §201.6(c)(4)(iii):</b> [The plan maintenance process shall include a] discussion on how the community will continue public participation in the plan maintenance process.	Pgs 14-15	<b>S</b> Page 14 indicates that the LEPC will encourage public participation in the plan review process. Page 15 indicates public involvement will be encouraged through public postings, newspapers, and newsletters.